NORTH CAROLINA DIVISION OF AIR QUALITY

Air Permit Review

Permit Issue Date: DRAFT

Region: Washington Regional Office
County: Craven
NC Facility ID: 2500158
Inspector's Name: Betsy Huddleston
Date of Last Inspection: 02/28/2017
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): Craven County Wood Energy, L.P.

Facility Address:
Craven County Wood Energy, L.P.
201 Executive Parkway
New Bern, NC 28562

SIC: 4911 / Electric Services
NAICS: 221119 / Other Electric Power Generation

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP:
NSPS:
NESHAP: GACT JJJJJJ and ZZZZ
PSD:
PSD Avoidance:
NC Toxics:
112(r):
Other: 02D .0614, Cross State Air Pollution Rule

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Wes Manspeaker Plant Engineer (252) 633-9525 201 Executive Parkway New Bern, NC 28562	Robert Van Ells Plant Manager (252) 633-9525 201 Executive Parkway New Bern, NC 28562	Wes Manspeaker Plant Engineer (252) 633-9525 201 Executive Parkway New Bern, NC 28562

Application Data

Application Number: 2500158.14B
Date Received: 03/26/2014
Application Type: Renewal
Application Schedule: TV-Renewal

Existing Permit Data
Existing Permit Number: 06419/T23
Existing Permit Issue Date: September 27, 2016
Existing Permit Expiration Date: 12/31/2019

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	70.21	754.67	26.53	1262.31	21.43	16.50	4.84 [Styrene]
2013	144.81	637.62	26.64	1266.78	21.52	16.46	4.86 [Styrene]
2012	50.30	705.80	27.60	1313.23	22.28	17.07	5.04 [Styrene]
2011	15.70	946.80	26.01	1236.70	20.99	15.61	4.75 [Styrene]
2010	70.20	1274.17	27.90	1327.10	22.51	4.40	2.12 [Chlorine]

Review Engineer: Jenny Sheppard

Review Engineer's Signature: **Date: DRAFT**

Comments / Recommendations:
Issue 06419/T24
Permit Issue Date:
Permit Expiration Date:

1. Purpose of Application:

Craven County Wood Energy, L.P. (CCWE) is currently operating under permit 06419T23 issued on September 27, 2016. The current permit expired December 31, 2014. The renewal application was received on March 26, 2014, nine months prior to the expiration date. The existing permit will continue to be effective until the issuance of this permit renewal pursuant to 15A NCAC 02Q .0513.

2. Facility Description

Craven County Wood Energy, L.P. generates electricity from the combustion of wood chips and other biomass fuels. Steam is generated in a 666 million Btu per hour rated capacity spreader-stoker boiler. The turbine/generator has been producing approximately 46-48 megawatts (MW) of electricity for sale to Duke Energy Progress. An additional 3 MWs are generated for operation of the facility. The facility operates 24 hours a day and 7 days a week.

3. Application Chronology/History/Table of Changes

January 19, 2010 – Title V Renewal permit number 06419T20 by David Putney, Applications .06A, .09A, and .09B consolidated into the renewal application .07A, changes included adding fire pump and emergency generator, modified description of ES5A, modify Acid Rain permit, and add CAIR language.

April 12, 2013 – Title V Minor Modification permit number 06419T21 by Charlie Yirka, modify the multicyclone (CD5A-1) that is installed on ES5A and reactivate flyash reinjection to ES5A.

June 27, 2014 – Title V Minor Modification permit number 06419T22 by Jeff Twisdale, updated fuel descriptions for ES5A.

September 27, 2016 – Title V Part I Significant Modification permit number 06419T23 by Jeff Twisdale, revised fuel restriction for poultry liter for ES5A. Added HAP minor per facility's request.

Table of Changes to Permit 06419T23

Page(s)	Section	Description of Change(s)
Cover	-	• Change the issuance dates of the permit and the permit revision number to T24 • Change the Responsible Official to Mr. Robert Van Ells • Added increment tracking for renewal
TOC	-	-updated shell titles
All	Header	-amended permit revision number
All	2.1	-updated monitoring/recordkeeping requirements for 2D .0515 and 2D .0521 throughout permit
All occurrences	2.1	-updated monitoring/recordkeeping requirement to current language and rule references
7-9	2.1 B, Table and 2.1 B 2 and 3	Changing the combination fuel equation from the 2D .0504 to 2D .0503.
13	2.1 B. 8.	Added CAM
13	2.1 B 9.	Added GACT JJJJJJ
17	2.1 C	Added MACT ZZZZ
24	2.3	Renewed Acid Rain Permit
25	2.4	Moved CAIR to Section 2.5 and added new CSAPR condition
26-34	General Conditions	-updated general conditions as per latest shell language
35	List of Acronyms	-updated list to current

4. New Equipment/Change in Emission and Regulatory Review

No new equipment was added or changed during this review. No physical changes have been made at the Company since the last Title V permit was issued.

The facility is subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 2D .0504, Particulates from Wood Burning Indirect Heat Exchangers
15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
15A NCAC 2D .0519, Control of Nitrogen Dioxide and Nitrogen Oxide Emissions
15A NCAC 2D .0521, Control of Visible Emissions
15A NCAC 2D .0524, New Source Performance Standards (Subparts Db)
15A NCAC 2D .0530, Prevention of Significant Deterioration
15A NCAC 2D .1100, Control of Toxic Air Pollutants
15A NCAC 2D .1111, Generally Achievable Control Technology (40 CFR 63, Subpart ZZZZ)(Area Source)
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 2D .2400, Clean Air Interstate Rules
15A NCAC 2Q .0400, Acid Rain Procedures

Based on the facility's most recent permit revisions as well as recent compliance inspections performed by the Washington Regional office, this facility is considered to be in compliance with all applicable Air Quality regulations.

In the current permit, the limit and standards list the firing of wood/Biomass in combination with other fuels is listed as 2D .0504. The equation used is from 2D .0503. All the monitoring, recordkeeping, and reporting will remain the same for each type of fuel and the control devices but the control device MRR will be included in both 2D .0503 and 2 D .0504.

5. Stipulation Review:

15A NCAC 02D .0614: COMPLIANCE ASSURANCE MONITORING

Craven County Wood Energy, L.P. submitted a CAM plan in the renewal application for this facility. This facility has one Pollutant-Specific Emission Units (PSEUs). The boiler (ES5A) primary fuel is biomass consisting of clean cellulosic biomass, Creosote treated wood, plywood trimmings, particle board, Weyerhaeuser sludge, and Brooder house poultry litter. The boiler is also permitted to burn natural gas and propane at startup only and onsite generated used oil. The boiler (ID No. ES5A) uses a multicyclone followed by an electrostatic precipitator as control devices.

The CAM rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at major source that is required to obtain Title V permit and it meets all of the following criteria:

a. is subject to an emission limitation or standard, except post 11/15/90 NSPS or NESHAP standards and except standards which specify continuous compliance determination;
b. uses a control device to achieve compliance, and
c. has potential pre-control emissions that exceed or are equivalent to the major source threshold.

The boiler has pre-controlled PM_{10} emissions greater than 100 tons per year based on the potential wood burned and an emission factor of 0.36 pounds of PM10 per million Btu heat and thus is subject to CAM. The applicable requirements are listed below:

A. The following calculations for the emissions from the boiler (ID No. ES5A) were performed using AP-42, September 2003, Supplement E, Fifth Edition, Tables 1.6-1.

Boiler: 666 million Btu per hour heat input
Heat Value of Dry Wood: 8000 Btu per lb of dry wood

Calculation of potential wood usage

$$\frac{666\times10^{6}\ Btu}{hour}\times\frac{1.0\ lb\ wood}{8000\ Btu}\times\frac{8760\ hours}{1\ year}\times\frac{ton\ wood}{2000\ lbs\ wood}=\frac{364{,}635\ tons\ wood}{yr}$$

Calculation of potential PM10 Emissions

AP-42 factor Dry Wood: 0.36 lb PM_{10} per million Btu heat input
Boiler: 666 million Btu per hour heat input
Heat Value of Dry Wood: 8000 Btu per lb of dry wood

$$\frac{0.36\ lbs\ PM_{10}}{million\ Btu}\times\frac{666\ million\ Btu}{hour}\times\frac{8760\ hours}{1\ year}\times\frac{ton\ PM_{10}}{2000\ lbs\ PM_{10}}=\frac{1050\ tons\ PM_{10}}{year}$$

The calculations for the boiler show that the "before control" PM_{10} emissions into the multicyclone and ESP are greater than 100 tons per year. Therefore, a CAM plan is required for boiler (ID No. ES5A).

- One wood-fired boiler (666 million Btu per hour heat input, ID No. ES5A)

1. Per 40 CFR 64 and 15A NCAC 2D .0614, the Permittee shall comply with the following:
2. Background
   a. Emission Units.
   i. Description: One wood-fired boiler (666 million Btu per hour heat input)

3. Applicable Regulation, Emission Limit, and Monitoring Requirements.
   a. Regulations: 15A NCAC 02D .0503, 02D .0504, 02D .0524 and 02D .0530
   b. Emission Limits: PM:0.274 pounds of particulate matter per million Btu, Wood Only
      PM: $Ec = [(0.274)(Q_W)+(0.202)(Q_O)]/Q_T$
      PM: 0.10 pounds of particulate matter per million Btu
      PM:0.041 pounds of particulate matter per million Btu, Wood Only

4. Control Technology. Multicyclone collector (56 twenty-four inch diameter tubes, ID No. CD5A-1) and Electrostatic precipitator (122,000 square feet of collection plate area, ID No. CD5A-2).

5. **Monitoring Approach:** The key elements of the monitoring approach are presented in the following:
   table.

Measure	**Indicator**
I. Indicator	Opacity of ESP exhaust
Measuring approach	Continuous opacity monitoring system (COMS) in ESP exhaust

Measure		Indicator
II.	Indicator Range	The opacity indicator range is a 1-hour average opacity of 20 percent. An excursion occurs when any 1-hour average opacity is greater than 20 percent. The excursion triggers corrective action and reporting requirement The QIP threshold is when the total duration of excursions is greater than 5 percent of the source operating time during any 6-month period. The QIP shall be prepared as required under 40 CFR 64.8.
III.	Performance Criteria	
	Data Representativeness	The COMS was installed at a representative location in the boiler ESP exhaust stack per 40 CFR 60, Appendix B, Performance Specification (PS-1)
	QA/QC Practices and Criteria	The COMS was initially installed and evaluated per PS-1. Zero and span drift are checked daily and a quarterly filter audit is performed.
	Monitoring Frequency	The opacity of the ESP exhaust is monitored continuously (every 10 seconds) using COMS.
	Data Collection Procedures	The data acquisition system shall retain all 6-minute data and 3-hour block averages according to PS-1.
	Averaging Period	The 10-second opacity data are used to calculate the 6-minute averages.

Justification:

a. Background. The pollutant specific emissions control unit at this facility is one 666 million Btu per hour heat input boiler (ID No. ES5A) firing biomass fuel consisting of: Clean cellulosic biomass***, Creosote treated wood, Plywood trimmings, Particle board, Weyerhaeuser sludge, and Brooder house poultry litter, Natural gas (startup fuel only), Propane (startup fuel only), and Used oil (onsite generation only).

b. Rationale for Selection of Performance Indicators and ranges.
Visible emissions (opacity) was selected as a performance indicator because high opacity can indicate higher than allowable particulate emissions. Opacity is a rough predictor of particulate emissions, since it is a function of many other parameters, including particle size distribution, light path angle and distance, optical background, and particle optical properties. However, significant changes in opacity can be a useful indicator pointing to possible multicyclone and ESP performance deficiencies. The opacity indicator limits coincide with emission limits in the existing air permit.

The opacity indicator range is 20% opacity. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented.

CCWE optimization program automatically adjusts fields based on opacity and spark rate. There is an opacity alarm triggered when the opacity exceeds 12 percent while operating under normal conditions. An inspection of all particulate control parameters will be initiated. The inspection will include monitoring of ESP pressure drop as an indicator of gas flow across the collection plates.

An alarm is generated for the ESP when the pressure drop reaches 2 inches of water. An excursion triggers an inspection and corrective action. If the pressure drop alarm sounds pressure drop and inlet/outlet temperatures will be recorded and all performance parameters (voltage, current, spark rate, pressure drop, inlet/outlet temperatures) will be recorded for the ESP to verify control equipment function.

15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

The language for Area Source for MACT JJJJJJ.

Applicability

For existing boiler in the biomass subcategory, ES5A**)**, the Permittee shall comply with all applicable provisions, including the notification, testing, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .1111, "Maximum Achievable Control Technology" as promulgated in 40 CFR 63, Subpart JJJJJJ, " National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers", including Subpart A "General Provisions."

Compliance Dates

The Permittee shall achieve compliance with the initial tune up requirement no later than March 21, 2014. [40 CFR 63.11196(a)(1), 63.11210(c)]

The Permittee shall comply with the energy assessment requirement no later than March 21, 2014. [40 CFR 63.11196(a)(3)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these requirements are not met.

Notification of Compliance Status

The Permittee shall submit a Notification of Compliance Status no later than July 19, 2014.

i. The Notification of Compliance Status must be signed by a responsible official and include the following certifications of compliance:
   (A) "This facility complies with the requirements in 40 CFR 63.11214 (i.e., condition h.) to conduct an initial tune-up of the boiler."
   (B) "This facility has had an energy assessment performed according to Table 2 to this subpart (i.e., conditions i. and j.) and is an accurate depiction of the facility."
   (C) "No secondary materials that are solid waste were combusted in any affected unit."
ii. The notification must be also submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements are not met.

General Compliance Requirements

At all times the Permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.11205(a)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements are not met.

Performance Tune-up Requirements

The Permittee shall conduct an initial tune-up of the boiler and subsequent tune-ups biennially.

i. Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up.
ii. The Permittee shall conduct the tune-ups while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

iii. The tune-ups shall be conducted according to the following procedures:
   (A) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.
   (B) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
   (C) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.
   (D) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
   (E) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
   (F) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.
   [40 CFR 63.11201(b), Table 2, 40 CFR 63.11223(a),(b)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements are not met.

Energy Assessment Requirements

The Permittee shall conduct a one-time energy assessment performed by a qualified energy assessor. The energy assessment must include the following items, with the extent of the evaluation for items (i) to (iv) appropriate for the on-site technical hours listed in 40 CFR 63.11237:

i. A visual inspection of the boiler system,
ii. An evaluation of operating characteristics of the affected boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints,
iii. An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator,
iv. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
v. A list of major energy conservation measures that are within the facility's control,
vi. A list of the energy savings potential of the energy conservation measures identified, and
vii. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
   [40 CFR 63.11201(b), Table 2]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements are not met.

Recordkeeping

The Permittee shall maintain the following records:

i. As required in 40 CFR 63.10(b)(2)(xiv), the Permittee shall keep a copy of each notification and report that was submitted to comply with this rule and all documentation supporting any Notification of Compliance Status that was submitted.
ii. The Permittee shall keep the following records to document conformance with the performance tune-ups:
   (A) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
   (B) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
   (C) A description of any corrective actions taken as a part of the tune-up of the boiler.
   (D) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
iii. The Permittee shall keep a copy of each boiler energy assessment report.

iv. Records of the occurrence and duration of each malfunction of the boiler or of the associated air pollution control and monitoring equipment.
v. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions, including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
vi. For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR 241.3(b)(1), the Permittee shall keep a record which documents how the secondary material meets each of the legitimacy criteria under 40 CFR 241.3(d)(1). If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(4), you must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2 and each of the legitimacy criteria in 40 CFR 241.3(d)(1). If the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c), you must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per 40 CFR 241.4, you must keep records documenting that the material is a listed non-waste under 40 CFR 241.4(a).
[40 CFR 63.11225(c), 63.11223(b)(6)]

The records must be in a form suitable and readily available for expeditious review. The Permittee shall keep each record for 5 years following the date of each recorded action. The Permittee shall keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The Permittee may keep the records off site for the remaining 3 years.
[40 CFR 63.11225(d)]
The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements are not met.

CAIR/ CSAPR requirements

a. CAIR requirements

According to 40 CFR 52.35(f) and 52.36(e), CAIR no longer applies as of January 1, 2015. CAIR has been moved to Section 2.5. in the permit, which is for non-applicable regulations.

According to 15A NCAC 2D .2401(a), the purpose of the 2D .2400 rules was to implement CAIR. Given that CAIR no longer applies, the NC rules that implement CAIR also do not apply. Therefore, references to 2D .2400 rules have been moved to Section 2.5. in the permit.

b. CSAPR requirements

CSAPR (specifically, 40 CFR Part 97, Subparts AAAAA, BBBBB, and CCCCC) was originally scheduled to take effect on January 1, 2012. This rule was planned as a replacement for CAIR. However, CSAPR was challenged in court and initially vacated by the DC Circuit Court. Legal issues were finally resolved in April 2014, when the US Supreme Court reversed that decision. Because the regulation was delayed by court proceedings, the effective date of the rule was moved to January 1, 2015.

Under this rule, the boiler at the facility is considered a "large electric generating unit", per 40 CFR 52.34. This rule and all requirements thereof are considered Federal-enforceable only. Compliance will be determined by the US EPA, not NC DAQ. A reference to this rule has been added to the permit.

6. NSPS Issues:

This facility is currently subject to NSPS Subpart Db regulations.

7. PSD/NAA Issues:

This facility is PSD Major. Craven County has been triggered for PSD increment tracking for PM10, SO2 and NOx, however, this renewal does not affect PSD increment tracking. Craven County is in an attainment area and NAA does not apply.

8. MACT Issues:

This facility is subject to 40 CFR 63 (Subpart JJJJJJ and ZZZZ Area Source for Boilers and RICE). The conditions area source conditions for the boiler (ES5A) and the engines (ES-11 and ES-12) have been added to the permit.

9. 112(r) Issues:

This facility is not subject to 112(r).

10. CAM Issues:

The facility is subject to CAM and the requirements have been included in the permit. See Stipulation review, Section 5.

11. Facility Wide Air Toxic Air Pollutants:

This renewal did not trigger toxics review.

12. Facility Compliance Status/Compliance History:

The facility was last inspected on February 28, 2017 by Betsy Huddleston of the Washington Regional Office and found to be in compliance at the time of the inspection. There has not been a NOV issued to this facility in the last five years. The facility has been issued two NODs since 2013, one for burning uncut tobacco which is not a listed fuel for the boiler and one for a late submittal of the semi annual reports required by the permit.

13. Public Notice / EPA and Affected State(s) Review

A notice of the draft Title V Permit was placed on the DAQ website. The notice provided for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice were sent to persons on the Title V mailing list and EPA. ***TO BE COMPLETED AFTER PUBLIC NOTICE(No additional comments were received.)***

Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. ***TO BE COMPLETED AFTER PUBLIC NOTICE (No additional comments were received)***. Also pursuant to 2Q .0522, a notice of the draft Title V Permit was provided to each affected State at or before the time notice provided to the public.

14. Conclusions, Comments, and Recommendations:

A professional engineer's seal was not required for this renewal Title V permit.

A consistency determination was not required for this renewal Title V permit.

(WaRO recommends issuance of Permit No. 06419T24.)

(Recommend issuance of Permit No. 06419T24.)